

**Yair Israel Babayoff**  
**69-09 138<sup>th</sup> Street Apt # 3D**  
**Flushing NY 11367-1653**  
**Cell 917-577-4623**  
**E-mail Yad14llc@msn.com**

**February 26, 2019**

US Bankruptcy Court Eastern District  
Honorable Nancy Hershy Lord  
271 Cadman Plaza East  
Brooklyn NY 11201-1800  
**VIA Email & US Mail**

CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF  
NEW YORK  
2019 MAR -4 A 11:28  
RECEIVED/MR

**Re: Yair Israel Babayoff 09-40780 , 18-40007**

To the Honorable Judge

I am requesting the court to allow grant me an immediate date for an order to show cause on a possible violation of an automatic stay for an employer withholding my commission due to the fact that I am in bankruptcy

**BACKGROUND**

In September 2002 I was engaged as a customer service Rep in Stanley Schusterman Inc. a/o SWS Insurance Brokerage (SWS) as a personal lines customer service rep, In April 2003 I obtained my NYS Brokers License to sell and receive commission for policies sold in the State of New York. Under my personal name

SWS agreed to pay me 33% of their commission compensation to me for all the accounts that I bring in on a yearly basis as long as SWS has it on the books

In 2004 A Friend and business partner of Solomon Fachalev David Zerbib which was also a client of my father contacted me for Insurance for His Mini Storage operation USA Mini Storage & American USA LLC. For Commercial Property & Commercial General Liability at the Time I was in an Agency in Manhattan, I was able to secure him a market and a rate to which the insured accepted and bound with Mini-co Insurance Company, a Company that was unknown to SWS when they insured similar /mini storage Operations as well in New Hyde Park, I decided to give the business to SWS as I had a good relationship with the owners I was paid commissions As an outside agent

*(When a outside producer submits business to a retail insurance agency the agency does all the paperwork and service and the producer receives a commission as long as the agency has the account on their books, on the time of submission of this Insured I was an outside producer for SWS)*

When the claim from Fachlaev in 2005 came to be and Zerbib left my father I was advised that I will not be receiving compensation from Zerbib until I resolve the Issue with Fachalev,

Zerbib had no relationship to SWS prior to my introduction, Zerbib could have very easily done a change of broker, instead he left it at SWS and advised them that If I was to be compensated he will remove the business from SWS in its entirety

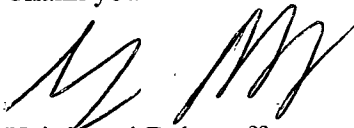
I was still getting compensated on other accounts regardless up until I switched all of my accounts because of this issue

The Commissions owed to me are at least 10,000 over the Years

SWS knew I was in Bankruptcy they even referred me to their friend attorney Mark Frankel back in 2007

I am requesting that if this issue is not resolved for the Ms Howard to advise of an available date for an order to show cause return date

Thank you



Yair Israel Babayoff

**CC SWS VIA Email & Regular Mail**  
**mschusterman.schus01@insuremail.net**